



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 6, 2022


REQUEST GRANTED.

VIA ECF

Hon. Lewis J. Liman
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

The time for Defendants' to respond to the Complaint is extended to September 6, 2022. The Initial Pretrial Conference previously set for July 19, 2022 is rescheduled to September 22, 2022 at 4:00PM. Parties are directed to dial into the Court's teleconference line at 888-251-2909 and use access code 2123101. Parties are reminded to jointly submit, by one week prior to the conference, a Case Management Plan and Scheduling Order consistent with the Court's individual practices.

Re: *Lin Chen v. Mayorkas, et al.*, 22 Civ. 3646 (LJL) 7/6/2022 SO ORDERED.


LEWIS J. LIMAN
United States District Judge

Dear Judge Liman:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services ("USCIS") to adjudicate an Application to Register Permanent Residence or Adjust Status (Form I-485) and two Refugee/Asylee Relative Petitions (Forms I-730). On behalf of the government, I write respectfully to request a sixty-day extension of the time to respond to the complaint (*i.e.*, from July 8, 2022, to September 6, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for July 19, 2022, be rescheduled for a date during the week of September 19, 2022, or thereafter (with a corresponding extension of time for the preconference submission).

I respectfully request this extension because USCIS is reviewing the Form I-485 and Forms I-730 and needs additional time to consider next steps, which may include a Request for Evidence, Notice of Intent to Deny, or other adjudicatory action. This is the government's first request for an extension of the deadline to respond to the complaint and to adjourn the conference. The government has been unable to obtain a response from the plaintiff regarding whether the plaintiff consents to the extension and adjournment requests given that the complaint provides no email address or telephone number. Although the government has mailed a letter to the plaintiff requesting that the plaintiff respond regarding whether the plaintiff consents to the extension and adjournment request, the government does not anticipate that it will receive a response from the plaintiff before the government's response to the complaint is due.¹

¹ The mailing address in the petition appears to correspond to a storefront mailbox center and is also the exact mailing address for the litigants in sixteen other cases recently filed in this District.

I thank the Court for its consideration of this letter.

Respectfully submitted,

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cc: Counsel of record (via ECF)